

EXHIBIT 1

INTRODUCTION

Respondent Mark Christopher Chevrolet, Inc. is a Delaware corporation, located and doing business as an auto dealership in Ontario, California. Respondent Mountain View Chevrolet, Inc. is a California corporation, located and doing business as an auto dealership in Upland, California. Respondent Diamond Hills Auto Group, Inc. is a California corporation, located and doing business as an auto dealership in Banning, California. Respondent Mark Leggio is a resident of San Bernardino County, and, at all times relevant to this stipulation, was a co-owner of the foregoing three auto dealerships.

Between January 2002 and June 2006, Respondents, collectively, made twenty-three campaign contributions to various state and local candidates, and a state recipient committee, in a name other than their own names, in violation of Government Code Section 84301 of the Political Reform Act (the "Act").¹ Most of the intermediaries, who were reimbursed by Respondents for making campaign contributions, were long-time employees of the auto dealerships, in management positions, and/or were relatives or friends of Respondent Leggio or one of his employees.

Most of the reimbursed contributions were made to candidates for state legislative office, and therefore, in many instances, the Act's campaign contribution limits were violated. In all instances, Respondent Leggio directed and controlled the contributions. These violations denied the public of information regarding the true source of the recipient's financial support.

For the purposes of this stipulation, Respondents' violations of the Act are as follows:

Laundering Violations:

COUNT 1: On or about January 15, 2002, Respondent Mark Christopher Chevrolet, Inc. made a \$3,000 contribution to Bob Dutton, a candidate for the State Assembly, in the name of Nicola Cacucciolo, Sr., rather than its own name, in violation of Section 84301 of the Government Code.

COUNT 2: On or about June 17, 2002, Respondent Mark Christopher Chevrolet, Inc. made a \$3,000 contribution to Bob Dutton, a candidate for the State Assembly, in the name of Audrey Byers, rather than its own name, in violation of Section 84301 of the Government Code.

COUNT 3: On or about June 18, 2002, Respondent Mark Christopher Chevrolet, Inc. made a \$3,000 contribution to Bob Dutton, a candidate for the State

¹ The Political Reform Act is contained in Government Code Sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

Assembly, in the name of Nicola Cacucciolo, Sr., rather than its own name, in violation of Section 84301 of the Government Code.

COUNT 4: On or about October 21, 2002, Respondent Mark Christopher Chevrolet, Inc. made a \$500 contribution to Bill Leonard, a candidate for the State Board of Equalization, in the name of Nicola Cacucciolo, Sr., rather than its own name, in violation of Section 84301 of the Government Code.

COUNT 5: On or about May 20, 2003, Respondent Mark Leggio made a \$1,000 contribution to the Gary Ovitt, a candidate for mayor in the City of Ontario, in the name of Nicola Cacucciolo, Sr., rather than his own name, in violation of Section 84301 of the Government Code.

COUNT 6: On or about June 28, 2003, Respondent Mountain View Chevrolet, Inc. made a \$3,200 contribution to Gayle Pacheco, a candidate for State Assembly, in the name of Annette Cacucciolo, rather than its own name, in violation of Section 84301 of the Government Code.

COUNT 7: On or about September 25, 2003, Respondent Mountain View Chevrolet, Inc. made a \$3,200 contribution to Elia Pirozzi, a candidate for State Assembly, in the name of James Deremiah, rather than its own name, in violation of Section 84301 of the Government Code.

COUNT 8: On or about September 26, 2003, Respondent Mountain View Chevrolet, Inc. made a \$3,200 contribution to Elia Pirozzi, a candidate for State Assembly, in the name of Nicola Cacucciolo, Sr., rather than its own name, in violation of Section 84301 of the Government Code.

COUNT 9: On or about March 11, 2004, Respondent Mark Leggio made a \$2,000 contribution to Jason Anderson, a candidate for Ontario City Council, in the name of Nicola Cacucciolo, Sr., rather than his own name, in violation of Section 84301 of the Government Code.

COUNT 10: On or about March 11, 2004, Respondent Mark Leggio made a \$2,000 contribution to Jason Anderson, a candidate for Ontario City Council, in the name of James Deremiah, rather than his own name, in violation of Section 84301 of the Government Code.

COUNT 11: On or about June 29, 2004, Respondent Mountain View Chevrolet, Inc. made a \$3,000 contribution to Alan Wapner, a candidate for State Assembly, in the name of Annette Cacucciolo, rather than its own name, in violation of Section 84301 of the Government Code.

COUNT 12: On or about June 29, 2004, Respondent Mountain View Chevrolet, Inc. made a \$3,000 contribution to Alan Wapner, a candidate for State Assembly, in the

name of Nicola Cacucciolo, Sr., rather than its own name, in violation of Section 84301 of the Government Code.

COUNT 13: On or about June 29, 2004, Respondent Mountain View Chevrolet, Inc. made a \$3,000 contribution to Alan Wapner, a candidate for State Assembly, in the name of James Deremiah, rather than its own name, in violation of Section 84301 of the Government Code.

COUNT 14: On or about July 20, 2004, Respondent Mountain View Chevrolet, Inc. made a \$3,200 contribution to Bob Dutton, a candidate for State Senate, in the name of James Deremiah, rather than its own name, in violation of Section 84301 of the Government Code.

COUNT 15: On or about March 31, 2005, Respondent Mountain View Chevrolet, Inc. made a \$5,000 contribution to the West Valley Young Republicans, a state recipient committee, in the name of Nicola Cacucciolo, Sr., rather than its own name, in violation of Section 84301 of the Government Code.

COUNT 16: On or about June 30, 2005, Respondent Mountain View Chevrolet, Inc. made a \$3,300 contribution to Anthony Adams, a candidate for State Assembly, in the name of Nicola Cacucciolo, Sr., rather than its own name, in violation of Section 84301 of the Government Code.

COUNT 17: On or about March 1, 2006, Respondent Mark Leggio made a \$3,300 contribution to Brenda Salas, a candidate for State Assembly, in the name of Nicola Cacucciolo, Jr., rather than his own name, in violation of Section 84301 of the Government Code.

COUNT 18: On or about March 1, 2006, Respondent Mark Leggio made a \$3,300 contribution to Brenda Salas, a candidate for State Assembly, in the name of Nicola Cacucciolo, Sr., rather than his own name, in violation of Section 84301 of the Government Code.

COUNT 19: On or about March 7, 2006, Respondent Mark Leggio made a \$3,300 contribution to Brenda Salas, a candidate for State Assembly, in the name of James Deremiah, rather than his own name, in violation of Section 84301 of the Government Code.

COUNT 20: On or about May 14, 2006, Respondent Diamond Hills Auto Group, Inc. made a \$2,000 non-monetary contribution to Brenda Salas, a candidate for State Assembly, in the name of Warren Fagerstrom, rather than its own name, in violation of Section 84301 of the Government Code.

COUNT 21: On or about June 28, 2006, Respondent Mark Leggio made a \$3,300 contribution to Brenda Salas, a candidate for State Assembly, in the name of

Lee Jones, rather than his own name, in violation of Section 84301 of the Government Code.

COUNT 22: On or about June 29, 2006, Respondent Mark Leggio made a \$3,300 contribution to Brenda Salas, a candidate for State Assembly, in the name of Paul LeMay, rather than his own name, in violation of Section 84301 of the Government Code.

COUNT 23: On or about June 29, 2006, Respondent Mark Leggio made a \$3,300 contribution to Brenda Salas, a candidate for State Assembly, in the name of Kristy Cacucciolo, rather than his own name, in violation of Section 84301 of the Government Code.

Contribution Limit Violations:

COUNT 24: On or about June 18, 2002, Respondents Mark Christopher Chevrolet, Inc., Mountain View Chevrolet, Inc. and Mark Leggio made contributions in excess of the \$3,000 contribution limit to a candidate for elective state office by making additional contributions totaling \$9,000 to Assembly candidate Bob Dutton, in violation of Section 85301, subdivision (a) of the Government Code.

COUNT 25: On or about and between June 25, 2003 and September 26, 2003, Respondents Mark Christopher Chevrolet, Inc., Mountain View Chevrolet, Inc. and Mark Leggio made contributions in excess of the \$3,200 contribution limit to a candidate for elective state office by making additional contributions totaling \$9,600 to Assembly candidate Elia Pirozzi, in violation of Section 85301, subdivision (a) of the Government Code.

COUNT 26: On or about June 29, 2004, Respondents Mark Christopher Chevrolet, Inc., Mountain View Chevrolet, Inc. and Mark Leggio made contributions in excess of the \$3,200 contribution limit to a candidate for elective state office by making additional contributions totaling \$12,200 to Assembly candidate Alan Wapner, in violation of Section 85301, subdivision (a) of the Government Code.

COUNT 27: On or about July 20, 2004, Respondents Mark Christopher Chevrolet, Inc., Mountain View Chevrolet, Inc. and Mark Leggio made contributions in excess of the \$3,200 contribution limit to a candidate for elective state office by making additional contributions totaling \$6,400 to Senate candidate Bob Dutton, in violation of Section 85301, subdivision (a) of the Government Code.

COUNT 28: On or about June 30, 2005, Respondents Mark Christopher Chevrolet, Inc., Mountain View Chevrolet, Inc. and Mark Leggio made contributions in

excess of the \$3,300 contribution limit to a candidate for elective state office by making additional contributions totaling \$6,600 to Assembly candidate Anthony Adams, in violation of Section 85301, subdivision (a) of the Government Code.

COUNT 29: On or about and between March 1, 2006 and June 29, 2006, Respondents Mark Christopher Chevrolet, Inc., Mountain View Chevrolet, Inc., Mark Leggio, and Diamond Hills Auto Group, Inc. made contributions in excess of the \$3,300 contribution limit to a candidate for elective state office by making additional contributions totaling \$21,800 to Assembly candidate Brenda Salas, in violation of Section 85301, subdivision (a) of the Government Code.

Major Donor Campaign Reporting Violations:

COUNT 30: Respondents Mark Christopher Chevrolet, Inc., Mountain View Chevrolet, Inc. and Mark Leggio failed to timely report contributions totaling \$11,250 on major donor campaign statements filed for the reporting period January 1, 2002 through December 31, 2002, in violation of Section 84211, subdivision (k).

COUNT 31: Respondents Mark Christopher Chevrolet, Inc., Mountain View Chevrolet, Inc. and Mark Leggio failed to timely report contributions totaling \$14,620 on major donor campaign statements filed for the reporting period January 1, 2003 through December 31, 2003, in violation of Section 84211, subdivision (k).

COUNT 32: Respondents Mark Christopher Chevrolet, Inc., Mountain View Chevrolet, Inc. and Mark Leggio failed to timely report contributions totaling \$25,900 on major donor campaign statements filed for the reporting period January 1, 2004 through December 31, 2004, in violation of Section 84211, subdivision (k).

COUNT 33: Respondents Mark Christopher Chevrolet, Inc., Mountain View Chevrolet, Inc. and Mark Leggio failed to timely report contributions totaling \$11,300 on major donor campaign statements filed for the reporting period January 1, 2005 through December 31, 2005, in violation of Section 84211, subdivision (k).

COUNT 34: Respondents Mark Christopher Chevrolet, Inc., Mountain View Chevrolet, Inc., Diamond Hills Auto Group, Inc. and Mark Leggio failed to timely report contributions totaling \$53,962 on major donor campaign statements filed for the reporting period January 1, 2006 through December 31, 2006, in violation of Section 84211, subdivision (k).

SUMMARY OF THE LAW

An express purpose of the Act, as set forth in Section 81002, subdivision (a), is to ensure that receipts and expenditures in election campaigns are fully and truthfully disclosed, so that voters may be fully informed, and improper practices may be inhibited. The Act provides for the full disclosure of receipts and expenditures in election campaigns through the periodic filing of campaign statements, as provided in Sections 84200 through 84211.

Prohibition Regarding Campaign Contributions

In order to obtain disclosure of the true source of a contribution, Section 84301 provides that no contribution shall be made, directly or indirectly, by any person in a name other than the name by which that person is identified for legal purposes.

Duty to Comply with Campaign Contribution Limits

The Act imposes limitations on contributions that may be made to candidates for elective state office. Section 82015, subdivision (a) defines a “contribution” as any payment made for political purposes for which full and adequate consideration is not made to the donor. Regulation 18215, subdivision (a) provides that a payment is made for political purposes if it is for the purpose of influencing or attempting to influence the action of the voters for or against the nomination or election of a candidate, or if it is received by a candidate.

Section 82007 defines a “candidate” to include an individual who receives a contribution or makes an expenditure with a view of bringing about his or her election to any elective office. Section 82024 defines “elective state office” to include the office of a member of the Legislature.

Under Section 85301, subdivision (a), a person may not make to a candidate for elective state office, other than a candidate for statewide elective office, a contribution totaling more than \$3,000 per person. Section 83124 requires the Commission to biennially adjust the contribution limits in Section 85301 to reflect changes in the Consumer Price Index.

Aggregation of Campaign Contributions by Affiliated Entities

For purposes of the contribution limits set forth in Chapter 5 of the Act, Section 85311, subdivision (b), provides that contributions of an entity whose contributions are directed and controlled by any individual shall be aggregated with contributions made by that individual and any other entity whose contributions are directed and controlled by the same individual. Pursuant to Section 85311, subdivision (a)(1), an “entity” means any person, other than an individual.²

² Section 82047 defines a “person” as an individual, proprietorship, firm, partnership, joint venture, syndicate, business trust, company, corporation, limited liability company, association, committee, and any other organization or group of persons acting in concert.

In addition, Regulation 18428, subdivision (a) provides specific guidelines for reporting contributions and expenditures whenever a monetary threshold identified in Chapter 4 or 5 of the Act has been met or exceeded. Pursuant to Regulation 18428, subdivision (b), any committee pursuant to Section 82013, subdivision (c) (“a major donor committee”) is required to aggregate contributions under Regulation 18215.1 and file campaign statements reflecting the total aggregate amount of contributions made during the reporting period. Pursuant to this subdivision, the campaign statement must be filed in the name of the individual or one of the contributing entities that directs and controls the making of payments of the entity or entities whose contributions are required to be aggregated.

Failure to Report Contributions on Major Donor Campaign Statements

Pursuant to Section 84200, subdivision (b), a committee, which has qualified as a major donor committee under Section 82013, subdivision (c), shall file semiannual campaign statements each year no later than July 31 for the six month period ending June 30, and no later than January 31 for the six month period ending December 31, if they have made contributions or independent expenditures during the six-month period before the closing date of the last statement.

Section 84211, subdivision (k) prescribes that certain information must be disclosed on campaign statements, which are required to be filed, including specific information regarding expenditures that are made during each reporting period, including the name and address of the payee, and the amount of the contribution or expenditure if it is \$100 or more. Pursuant to Section 84211, subdivision (k)(5), when the expenditure is a contribution to a candidate or committee, as in the case of a major donor committee, the filer must also report the date of the contribution, the cumulative amount of contributions made to the candidate or committee, the full name of the candidate, and the office and district for which the candidate is seeking nomination or election.

Statute of Limitations for Administrative Proceedings

Section 91000.5 provides that an administrative action, pursuant to Chapter 3 of the Act (commencing with Section 83100), alleging a violation of any provisions of the Act, shall not be commenced more than five years after the date on which the violation occurred. The violations set forth in Counts 1 through 8, 24, 25 and 30 occurred between January 15, 2002 and September 26, 2003, which is outside of this five-year statutory period.

However, Section 91000.5, subdivision (b) provides that if a person alleged to have violated the Act engages in fraudulent concealment of his acts or identity, the five-year period shall be tolled for the period of concealment. For purposes of this subdivision, “fraudulent concealment” means the person knows material facts related to his duties under the Act, and knowingly conceals them in performing or omitting to perform those duties, for the purpose of defrauding the public of information to which it is entitled under the Act.

SUMMARY OF THE FACTS

Respondent Mark Christopher Chevrolet, Inc. (“Mark Christopher Chevrolet”) is a Delaware corporation, located and doing business as an auto dealership in Ontario, California.³ Respondent Mountain View Chevrolet, Inc. (“Mountain View Chevrolet”) is a California corporation, located and doing business as an auto dealership in Upland, California. Respondent Diamond Hills Auto Group, Inc. (“Diamond Hills Auto Group”) is a California corporation, located and doing business as an auto dealership in Banning, California. Respondent Mark Leggio, a resident of San Bernardino County and a co-owner of the three auto dealerships at all times referred to in this stipulation, was the person who directed and controlled the contributions made by the auto dealerships alleged herein.

Between January 2002 and June 2006, Respondents reimbursed others persons for making contributions to various state and local candidates or committees in their own names rather than in Respondents’ names. The persons who were reimbursed by Respondents for making the campaign contributions were employees of the auto dealerships, in management positions, and/or were relatives or friends of Respondent Leggio or his employees. At the times alleged herein, the persons who acted as intermediaries are described as follows:

Nicola Cacucciolo, Sr. was a Fleet Manager for Respondent Mountain View Chevrolet and a cousin of Respondent Leggio. James Westley was a General Sales Manager for Respondent Mark Christopher Chevrolet. Nick Cacucciolo, Jr. was a General Manager for Respondent Mark Christopher Chevrolet and a cousin of Respondent Leggio. Warren Fagerstrom was a Manager for Respondent Diamond Hills Auto Group. Lee Jones was a Service Manager for Respondent Mark Christopher Chevrolet. Paul LeMay was the husband of Miki LeMay, who was an Administrative Assistant for Respondent Mountain View Chevrolet. James Deremiah was a former employee of Respondent Mark Christopher Chevrolet and a longtime friend of Respondent Leggio. Audrey Byers was the sister of James Deremiah. Annette Cacucciolo was the wife of Nicola Cacucciolo, Sr., and Kristy Cacucciolo was the wife of Nick Cacucciolo, Jr.

COUNTS 1 - 3

Making a Contribution in a Name Other Than One’s Own Name

On or about and between January 15, 2002 and June 18, 2002, Respondent Mark Christopher Chevrolet made three contributions, totaling \$9,000, to the “Bob Dutton for Assembly” committee, in names other than its own name, in violation of Section 84301. Respondent made the contributions by issuing a check to each of the three contributors as reimbursement for their contributions. Bob Dutton for Assembly was the controlled committee of Bob Dutton, a successful candidate for the State Assembly, 63rd Assembly District, in the 2002 state primary and general elections. Respondent Mark Christopher Chevrolet did not notify the Bob Dutton campaign that it was the true source of these three contributions. In addition, on or about June 18, 2002, Respondents Mark Christopher

³ Respondent Mark Christopher Chevrolet also does business in the name of Mark Christopher Auto Center. In some instances, contributions were made and reported in the name of Mark Christopher Auto Center. For purposes of this Exhibit, the name “Respondent Mark Christopher Chevrolet” is used for both names.

Chevrolet and Mountain View Chevrolet each made a \$3,000 contribution to Bob Dutton for Assembly.

The three contributions made by Respondent Mark Christopher Chevrolet to Bob Dutton for Assembly, in the names of persons who were employed by or were friends or relatives of business associates of Respondents, are as follows:

Count	Receipt Date of Contribution	Person Reported as Contributor	Relationship to Respondent	Amount
1	01/15/02	Nicola Cacucciolo, Sr.	Employee	\$3,000
2	06/17/02	Audrey Byers	Relative of former Employee	\$3,000
3	06/18/02	Nicola Cacucciolo, Sr.	Employee	\$3,000
Total				\$9,000

By making the above three contributions, Respondent Mark Christopher Chevrolet committed three violations of Section 84301.

COUNT 4

Making a Contribution in a Name Other Than One's Own Name

On or about October 21, 2002, Respondent Mark Christopher Chevrolet made a \$500 contribution to the "Bill Leonard for Board of Equalization" committee, in a name other than its own name, in violation of Section 84301. Respondent Mark Christopher Chevrolet made the contribution by issuing a check to a contributor as reimbursement for his contribution. "Bill Leonard for Board of Equalization" was the controlled committee of Bill Leonard, a successful candidate for the State Board of Equalization in the 2002 state primary and general elections. Respondent Mark Christopher Chevrolet did not notify the Bill Leonard campaign that it was the true source of this contribution. In addition, on or about October 21, 2002, Respondent Mountain View Chevrolet made a \$900 contribution to Bill Leonard for Board of Equalization.

The contribution that was made by Respondent Mark Christopher Chevrolet to Bill Leonard for Board for Equalization, in the name of a person who was employed by Respondents, is as follows:

Count	Receipt Date of Contribution	Person Reported as Contributor	Relationship to Respondent	Amount
4	10/21/02	Nicola Cacucciolo, Sr.	Employee	\$500
Total				\$500

By making the above contribution, Respondent Mark Christopher Chevrolet committed a violation of Section 84301.

COUNT 5
Making a Contribution in a Name Other Than One's Own Name

On or about May 20, 2003, Respondent Mark Leggio made a contribution, totaling \$1,000, to the "Committee to Elect Gary Ovitt Mayor" committee, in a name other than his own name, in violation of Section 84301. Respondent Leggio made the contribution by reimbursing a contributor in cash for his contribution. The "Committee to Elect Gary Ovitt Mayor" was the controlled committee of Gary Ovitt, the former mayor of the City of Ontario, who was elected to the San Bernardino County Board of Supervisors in 2004. Respondent Leggio did not notify the Gary Ovitt campaign that he was the true source of this contribution. In addition, on or about May 20, 2003, Respondents Mark Christopher Chevrolet and Mountain View Chevrolet each made a \$1,000 contribution to the Committee to Elect Gary Ovitt Mayor.

The contribution that was made by Respondent Mark Leggio to the Committee to Elect Gary Ovitt Mayor, in the name of a person who was employed by Respondents, is as follows:

Count	Receipt Date of Contribution	Person Reported as Contributor	Relationship to Respondent	Amount
5	05/20/03	Nicola Cacucciolo, Sr.	Employee	\$1,000
Total				\$1,000

By making the above contribution, Respondent Mark Leggio committed a violation of Section 84301.

COUNT 6
Making a Contribution in a Name Other Than One's Own Name

On or about June 28, 2003, Respondent Mountain View Chevrolet made a \$3,200 contribution to the "Committee to Elect Gayle Pacheco to Assembly," in a name other than its own name, in violation of Section 84301. Respondent Mountain View Chevrolet made the contribution by issuing a check to the contributor as reimbursement for her contribution. The "Committee to Elect Gayle Pacheco to Assembly" was the controlled committee of Gayle Pacheco, an unsuccessful candidate for the State Assembly, 60th Assembly District, in the March 2, 2004 primary election. Respondent Mountain View Chevrolet did not notify the Gayle Pacheco campaign that it was the true source of this contribution.

The contribution made by Respondent Mountain View Chevrolet to the Committee to Elect Gayle Pacheco to Assembly, in the name of a person who was related to Respondents' employee, is as follows:

Count	Receipt Date of Contribution	Person Reported as Contributor	Relationship to Respondent	Amount
6	06/28/03	Annette Cacucciolo	Relative of Employee	\$3,200
Total				\$3,200

By making the above contribution, Respondent Mountain View Chevrolet committed a violation of Section 84301.

COUNTS 7 - 8

Making a Contribution in a Name Other Than One's Own Name

On or about and between September 25 and 26, 2003, Respondent Mountain View Chevrolet made two contributions, totaling \$6,400, to the "Pirozzi for Assembly Committee," in names other than its own name, in violation of Section 84301. Respondent Mountain View Chevrolet made the contributions by issuing a check to each contributor as reimbursement for their contribution. The "Pirozzi for Assembly Committee" was the controlled committee of Elia Pirozzi, an unsuccessful candidate for the State Assembly, 63rd Assembly District, in the March 2, 2004 primary election. Respondent Mountain View Chevrolet did not notify the Elia Pirozzi campaign that it was the true source of these two contributions. In addition, on or about and between June 13 and 26, 2003, Respondent Mountain View Chevrolet and Mark Christopher Chevrolet each made a \$3,200 contribution to the Pirozzi for Assembly Committee.

The two contributions that were made by Respondent Mountain View Chevrolet to the Pirozzi for Assembly Committee, in the names of persons who were employed by, or were former employees of, Respondents are as follows:

Count	Receipt Date of Contribution	Person Reported as Contributor	Relationship to Respondent	Amount
7	09/25/03	James Deremiah	Former employee-friend	\$3,200
8	09/26/03	Nicola Cacucciolo, Sr.	Employee	\$3,200
Total				\$6,400

By making the above two contributions, Respondent Mountain View Chevrolet committed two violations of Section 84301.

COUNTS 9 - 10

Making a Contribution in a Name Other Than One's Own Name

On or about March 11, 2004, Respondent Mark Leggio made two contributions, totaling \$4,000, to the "Committee to Elect Jason Anderson," in names other than his own name, in violation of Section 84301. Respondent Leggio made the contributions by reimbursing two contributors in cash for their contributions. The "Committee to Elect Jason Anderson" was the controlled committee of Jason Anderson, a successful candidate for the Ontario City Council in the March 2, 2004 city election. Respondent Leggio did not notify the Jason Anderson campaign that he was the true source of these two contributions. In addition, on or about and between February 26, 2004 and September 14, 2004, Respondent Mark Christopher Chevrolet made non-monetary contributions totaling \$6,977.91, and on September 8, 2004 it made a \$2,000 monetary contribution, to the Committee to Elect Jason Anderson.

The two contributions that were made by Respondent Mark Leggio to the Committee to Elect Jason Anderson, in the names of persons who were employed by, or were former employees of, Respondents are as follows:

Count	Receipt Date of Contribution	Person Reported as Contributor	Relationship to Respondent	Amount
9	03/11/04	Nicola Cacucciolo, Sr.	Employee	\$2,000
10	03/11/04	James Deremiah	Former employee-friend	\$2,000
Total				\$4,000

By making the above two contributions, Respondent Mark Leggio committed two violations of Section 84301.

COUNT 11 - 13

Making a Contribution in a Name Other Than One's Own Name

On or about June 29, 2004, Respondent Mountain View Chevrolet made three contributions, totaling \$9,000, to the "Wapner for Assembly 2004" committee, in names other than its own name, in violation of Section 84301. Respondent Mountain View Chevrolet made the contributions by issuing a check to each contributor as reimbursement for their contribution. "Wapner for Assembly 2004" was the controlled committee of Alan Wapner, an unsuccessful candidate for the State Assembly, 61st Assembly District, in the November 2, 2004 general election. Respondent Mountain View Chevrolet did not notify the Alan Wapner campaign that it was the true source of the contributions. In addition, on or about June 29, 2004, Respondents Mark Christopher Chevrolet and Mountain View Chevrolet each made a \$3,200 contribution to the Wapner for Assembly 2004 committee.

The contributions made by Respondent Mountain View Chevrolet to the Wapner for Assembly 2004 committee, in the name of persons who were employees, former employees, or a relative of an employee of Respondents are as follows:

Count	Receipt Date of Contribution	Person Reported as Contributor	Relationship to Respondent	Amount
11	06/29/04	Annette Cacucciolo	Relative of Employee	\$3,000
12	06/29/04	Nicola Cacucciolo, Sr.	Employee	\$3,000
13	06/29/04	James Deremiah	Former employee-friend	\$3,000
Total				\$9,000

By making the above contributions, Respondent Mountain View Chevrolet committed three violations of Section 84301.

COUNT 14

Making a Contribution in a Name Other Than One's Own Name

On or about July 20, 2004, Respondent Mountain View Chevrolet made a \$3,200 contribution to the "Bob Dutton for State Senate" committee, in a name other than its own name, in violation of Section 84301. Respondent Mountain View Chevrolet made the contribution by issuing a check to the contributor as reimbursement for his contribution. "Bob Dutton for State Senate" was the controlled committee of Bob Dutton, a successful candidate for the State Senate, 31st Senate District, in the November 2, 2004 general election. Respondent Mountain View Chevrolet did not notify the Bob Dutton campaign that it was the true source of this contribution. In addition, on or about July 20, 2004, Respondents Mountain View Chevrolet and Mark Christopher Chevrolet each made a \$3,200 contribution to Bob Dutton for State Senate.

The contribution made by Respondent Mountain View Chevrolet to Bob Dutton for State Senate, in the name of a person who was a former employee of Respondents, is as follows:

Count	Receipt Date of Contribution	Person Reported as Contributor	Relationship to Respondent	Amount
14	07/20/04	James Deremiah	Former employee-friend	\$3,200
Total				\$3,200

By making the above contribution, Respondent Mountain View Chevrolet committed a violation of Section 84301.

COUNT 15

Making a Contribution in a Name Other Than One's Own Name

On or about March 31, 2005, Respondent Mountain View Chevrolet made a \$5,000 contribution to the "West Valley Young Republicans" committee, in a name other than its own name, in violation of Section 84301. Respondent Mountain View Chevrolet made the contribution by issuing a check to the contributor as reimbursement for his contribution. "West Valley Young Republicans" was a state general purpose recipient committee located in San Bernardino County. Respondent Mountain View Chevrolet did not notify the committee that it was the true source of this contribution. In addition, during 2005, Respondents made contributions totaling over \$26,000 to the West Valley Young Republicans.

The contribution made by Respondent Mountain View Chevrolet to the West Valley Young Republicans committee, in the name of a person employed by Respondents, is as follows:

Count	Receipt Date of Contribution	Person Reported as Contributor	Relationship to Respondent	Amount
15	03/31/05	Nicola Cacucciolo, Sr.	Employee	\$5,000
Total				\$5,000

By making the above contribution, Respondent Mountain View Chevrolet committed a violation of Section 84301.

COUNT 16

Making a Contribution in a Name Other Than One's Own Name

On or about June 30, 2005, Respondent Mountain View Chevrolet made a \$3,300 contribution to the "Anthony Adams for Assembly" committee, in a name other than its own name, in violation of Section 84301. Respondent Mountain View Chevrolet made the contribution by issuing a check to the contributor as reimbursement for the contribution. "Anthony Adams for Assembly" was the controlled committee of Anthony Adams, a successful candidate for the State Assembly, 59th Assembly District, in the June 6, 2006 primary election and November 7, 2006 general election. Respondent Mountain View Chevrolet did not notify the Anthony Adams campaign that it was the true source of this contribution. In addition, on or about June 30, 2005, Respondents Mountain View Chevrolet and Mark Christopher Chevrolet each made a \$3,300 contribution to Anthony Adams for Assembly.

The contribution made by Respondent Mountain View Chevrolet to Anthony Adams for Assembly, in the name of a person who was an employee of Respondents, is as follows:

Count	Receipt Date of Contribution	Person Reported as Contributor	Relationship to Respondent	Amount
16	06/30/05	Nicola Cacucciolo, Sr.	Employee	\$3,300
Total				\$3,300

By making the above contribution, Respondent Mountain View Chevrolet committed a violation of Section 84301.

COUNTS 17 - 23

Making a Contribution in a Name Other Than One's Own Name

On or about and between March 1, 2006 and June 29, 2006, Respondent Mark Leggio made six contributions, totaling \$19,800, to the "Committee to Elect Brenda Salas," in names other than his own name, in violation of Section 84301. In addition, on May 14, 2006, Respondent Diamond Hills Auto Group made a \$2,000 non-monetary contribution, in a name other than its own name, to the "Committee to Elect Brenda Salas," in the form of a billboard advertisement. Respondent Leggio made the six contributions by reimbursing six contributors in cash for their contributions, and Respondent Diamond Hills Auto Group made the contribution indirectly by not disclosing to the recipient that it was the true source of a non-monetary contribution.

The "Committee to Elect Brenda Salas" was the controlled committee of Brenda Salas, an unsuccessful candidate for the State Assembly, 65th Assembly District, in the June 6, 2006, primary election. Respondents Leggio and Diamond Hills Auto Group did not notify the Brenda Salas campaign that they were the true source of these seven contributions. In addition, on or about

December 28, 2005, Respondent Diamond Hills Auto Group made a \$3,300 contribution to the Committee to Elect Brenda Salas.

The contributions that were made by Respondent Mark Leggio and Diamond Hills Auto Group to the Committee to Elect Brenda Salas, in the names of persons who were employed by Respondents, or a friend, or relative of an employee, are as follows:

Count	Receipt Date of Contribution	Person Reported as Contributor	Relationship to Respondent	Amount
17	03/01/06	Nick Cacucciolo, Jr.	Employee	\$3,300
18	03/01/06	Nicola Cacucciolo, Sr.	Employee	\$3,300
19	03/07/06	James Deremiah	Former employee-friend	\$3,300
20	05/14/06	Warren Fagerstrom	Employee	\$2,000
21	06/28/06	Lee Jones	Employee	\$3,300
22	06/29/06	Paul LeMay	Husband of an employee	\$3,300
23	06/29/06	Kristy Cacucciolo	Wife of an employee	\$3,300 ⁴
Total				\$21,800

By making the above seven contributions, Respondent Mark Leggio committed six violations, and Respondent Diamond Hills Auto Group committed one violation, of Section 84301.

COUNT 24

Making Contributions in Excess of the Contribution Limit

In 2002, a person could not make a contribution to a candidate for elective state office totaling more than \$3,000 per election, pursuant to Section 85301, subdivision (a). As such, Respondents collectively, as affiliated entities, could only make one \$3,000 contribution to a state legislative candidate in the 2002 primary election and one \$3,000 contribution to the same candidate in the 2002 general election.

On January 15, 2002, Respondent Mark Christopher Chevrolet made a \$3,000 contribution to the Bob Dutton for Assembly committee, indirectly through Nicola Cacucciolo, Sr., for the March 5, 2002 primary election, as set forth in Count 1 above.

On or about June 18, 2002, Respondent Mark Christopher Chevrolet made a \$3,000 contribution to the Bob Dutton for Assembly committee in its own name, for the November 5, 2002 general election. In June 2002, Respondent Mark Christopher Chevrolet made two \$3,000 contributions in the names of other persons by reimbursing them as set forth in Counts 2 and 3 above. On or about June 18, 2002, Respondent Mountain View Chevrolet made a \$3,000 contribution to the Bob Dutton for Assembly committee in its own name.

⁴ The reimbursed contributions, totaling \$9,900, listed in Counts 21-23 were made after Brenda Salas lost the June 6, 2006 primary election.

By making three contributions in the amount of \$3,000 each, totaling \$9,000, in excess of the \$3,000 contribution limit, in the names of Nicola Cacucciolo, Sr., Audrey Byers, and Respondent Mountain View Chevrolet, Respondents Mark Christopher Chevrolet, Mountain View Chevrolet and Mark Leggio, violated the contribution limits set forth in Section 85301, subdivision (a).

COUNT 25

Making Contributions in Excess of the Contribution Limit

In 2003, a person could not make a contribution to a candidate for elective state office totaling more than \$3,200 per election, pursuant to Sections 85301, subdivision (a) and 83124.⁵ As such, Respondents collectively, as affiliated entities, could only make one \$3,200 contribution to a state legislative candidate in the 2003 primary election and one \$3,200 contribution to the same candidate in the 2003 general election.

On June 25, 2003, Respondent Mark Christopher Chevrolet made a \$3,200 contribution to the Pirozzi for Assembly Committee in its own name. In addition, on or about June 30, 2003, Respondent Mountain View Chevrolet made a \$3,200 contribution to the Pirozzi for Assembly Committee in its own name. Respondent Mountain View Chevrolet made two additional \$3,200 contributions in the names of other persons by reimbursing them as set forth in Counts 7 and 8 above.

By making three contributions in the amount of \$3,200 each, totaling \$9,600, in excess of the \$3,200 contribution limit, in the names of James Deremiah, Nicola Cacucciolo, Sr., and Respondent Mountain View Chevrolet, Respondents Mark Christopher Chevrolet, Mountain View Chevrolet and Mark Leggio, violated the contribution limits set forth in Sections 85301, subdivision (a).

COUNT 26

Making Contributions in Excess of the Contribution Limit

In 2004, a person could not make a contribution to a candidate for elective state office totaling more than \$3,200 per election, pursuant to Sections 85301, subdivision (a) and 83124. As such, Respondents collectively, as affiliated entities, could only make one \$3,200 contribution to a state legislative candidate in the 2004 primary election and one \$3,200 contribution to the same candidate in the 2004 general election.

On or about June 29, 2004, Respondents Mark Christopher Chevrolet and Mountain View Chevrolet each made a \$3,200 contribution to the Wapner for Assembly 2004 committee in their own names for the 2004 general election. Respondent Mountain View Chevrolet made three additional contributions, in the amount of \$3,000 each, in the names of other persons by reimbursing them as set forth in Counts 11 through 13 above.

⁵ In 2003 and 2004, pursuant to Section 83124, the contribution limits set forth in Section 85301, subdivision (a) were adjusted to \$3,200.

By making four contributions, totaling \$12,200, in excess of the \$3,200 contribution limit, in the names of Annette Cacucciolo, Nicola Cacucciolo, Sr., James Deremiah and Respondent Mark Christopher Chevrolet, Respondents Mark Christopher Chevrolet, Mountain View Chevrolet and Mark Leggio, violated the contribution limits set forth in Sections 85301, subdivision (a).

COUNT 27

Making Contributions in Excess of the Contribution Limit

In 2004, a person could not make a contribution to a candidate for elective state office totaling more than \$3,200 per election, pursuant to Sections 85301, subdivision (a) and 83124. As such, Respondents collectively, as affiliated entities, could only make one \$3,200 contribution to a state legislative candidate in the 2004 primary election and one \$3,200 contribution to the same candidate in the 2004 general election.

On or about July 20, 2004, Respondents Mark Christopher Chevrolet and Mountain View Chevrolet each made a \$3,200 contribution to the Bob Dutton for State Senate committee in their own names for the 2004 general election. Respondent Mountain View Chevrolet made an additional contribution, in the amount of \$3,200, in the name of another person by reimbursing him as set forth in Count 14 above.

By making two contributions, totaling \$6,400, in excess of the \$3,200 contribution limit, in the names of James Deremiah and Respondent Mark Christopher Chevrolet, Respondents Mark Christopher Chevrolet, Mountain View Chevrolet and Mark Leggio, violated the contribution limits set forth in Sections 85301, subdivision (a).

COUNT 28

Making Contributions in Excess of the Contribution Limit

In 2005 and 2006, a person could not make a contribution to a candidate for elective state office totaling more than \$3,300 per election, pursuant to Sections 85301, subdivision (a) and 83124.⁶ As such, Respondents collectively, as affiliated entities, could only make one \$3,300 contribution to a state legislative candidate in the 2006 primary election and one \$3,300 contribution to the same candidate in the 2006 general election.

On or about June 30, 2005, Respondents Mark Christopher Chevrolet and Mountain View Chevrolet each made a \$3,300 contribution to the Anthony Adams for Assembly committee in their own names for the 2006 primary election. Respondent Mountain View Chevrolet made an additional contribution, in the amount of \$3,300, in the name of another person by reimbursing him as set forth in Count 16 above.

⁶ In 2005 and 2006, pursuant to Section 83124, the contribution limits set forth in Section 85301, subdivision (a) were adjusted to \$3,300.

By making two contributions, totaling \$6,600, in excess of the \$3,300 contribution limit, in the names of Nicola Cacucciolo, Sr. and Respondent Mark Christopher Chevrolet, Respondents Mark Christopher Chevrolet, Mountain View Chevrolet and Mark Leggio, violated the contribution limits set forth in Sections 85301, subdivision (a).

COUNT 29

Making Contributions in Excess of the Contribution Limit

In 2006, a person could not make a contribution to a candidate for elective state office totaling more than \$3,300 per election, pursuant to Sections 85301, subdivision (a) and 83124. As such, Respondents collectively, as affiliated entities, could only make one \$3,300 contribution to a state legislative candidate in the 2006 primary election and one \$3,300 contribution to the same candidate in the 2006 general election.

On or about December 28, 2005, Respondent Diamond Hills Auto Group made a \$3,300 contribution to the Committee to Elect Brenda Salas in its own name for the 2006 primary election. Respondent Diamond Hills Auto Group made an additional \$2,000 contribution in the name of another person, as set forth in Count 20 above. Respondent Mark Leggio also made six \$3,300 contributions, totaling \$19,800, in the names of other persons by reimbursing them for their contributions, as set forth in Counts 17 through 19, and Counts 21 through 23.

By making seven contributions, totaling \$21,800, in excess of the \$3,300 contribution limit, in the names of Nick Cacucciolo, Jr., Nicola Cacucciolo, Sr., James Deremiah, Warren Fagerstrom, Lee Jones, Paul LeMay, and Kristy Cacucciolo, Respondents Mark Christopher Chevrolet, Mountain View Chevrolet, Mark Leggio, and Diamond Hills Auto Group violated the contribution limits set forth in Sections 85301, subdivision (a).

COUNT 30

Failure to Disclose Contributions of \$100 or More

In 2002, Respondents qualified as a major donor committee, pursuant to Section 82013, subdivision (c). As such, Respondents were required to itemize and disclose information regarding payments in the form of contributions of \$100 or more made during the reporting period from January 1, 2002 through December 31, 2002. On major donor statements filed for reporting periods in 2002, Respondents reported making payments in the form of contributions to state and local candidates and committees totaling \$229,953. Respondents failed to disclose contributions totaling \$11,250 made during the 2002 reporting periods, including the reimbursed contributions set forth in Counts 1 through 4.

By failing to timely disclose contributions totaling \$11,250 on major donor campaign statements filed for reporting periods in 2002, Respondents violated Section 84211, subdivision (k).

COUNT 31

Failure to Disclose Contributions of \$100 or More

In 2003, Respondents qualified as a major donor committee, pursuant to Section 82013, subdivision (c). As such, Respondents were required to itemize and disclose information regarding payments in the form of contributions of \$100 or more made during the reporting period from January 1, 2003 through December 31, 2003. On major donor statements filed for reporting periods in 2003, Respondents reported making payments in the form of contributions to state and local candidates and committees totaling \$113,850. Respondents failed to disclose contributions totaling \$14,620 made during the 2003 reporting periods, including the reimbursed contributions set forth in Counts 5 through 8.

By failing to timely disclose contributions totaling \$14,620 on major donor campaign statements filed for reporting periods in 2003, Respondents violated Section 84211, subdivision (k).

COUNT 32

Failure to Disclose Contributions of \$100 or More

In 2004, Respondents qualified as a major donor committee, pursuant to Section 82013, subdivision (c). As such, Respondents were required to itemize and disclose information regarding payments in the form of contributions of \$100 or more made during the reporting period from January 1, 2004 through December 31, 2004. On major donor statements filed for reporting periods in 2004, Respondents reported making payments in the form of contributions to state and local candidates and committees totaling \$189,669. Respondents failed to disclose contributions totaling \$25,900 made during the 2004 reporting periods, including the reimbursed contributions set forth in Counts 9 through 14.

By failing to timely disclose contributions totaling \$25,900 on major donor campaign statements filed for reporting periods in 2004, Respondents violated Section 84211, subdivision (k).

COUNT 33

Failure to Disclose Contributions of \$100 or More

In 2005, Respondents qualified as a major donor committee, pursuant to Section 82013, subdivision (c). As such, Respondents were required to itemize and disclose information regarding payments in the form of contributions of \$100 or more made during the reporting period from January 1, 2005 through December 31, 2005. On major donor statements filed for reporting periods in 2005, Respondents reported making payments in the form of contributions to state and local candidates and committees totaling \$187,217. Respondents failed to disclose contributions totaling \$11,300 made during the 2005 reporting periods, including the reimbursed contributions set forth in Counts 15 through 16.

By failing to timely disclose contributions totaling \$11,300 on major donor campaign statements filed for reporting periods in 2005, Respondents violated Section 84211, subdivision (k).

COUNT 34
Failure to Disclose Contributions of \$100 or More

In 2006, Respondents qualified as a major donor committee, pursuant to Section 82013, subdivision (c). As such, Respondents were required to itemize and disclose information regarding payments in the form of contributions of \$100 or more made during the reporting period from January 1, 2006 through December 31, 2006. On major donor statements filed for reporting periods in 2006, Respondents reported making payments in the form of contributions to state and local candidates and committees totaling \$350,617. Respondents failed to disclose contributions totaling \$53,962 made during the 2006 reporting periods, including the reimbursed contributions set forth in Counts 17 through 23.

By failing to timely disclose contributions totaling \$53,962 on major donor campaign statements filed for reporting periods in 2006, Respondents violated Section 84211, subdivision (k).

CONCLUSION

This matter consists of twenty-three violations of Section 84301, six violations of Section 85301, subdivision (a), and five violations of Section 84211, subdivision (k), which carry a maximum administrative penalty of One Hundred and Seventy Thousand Dollars (\$170,000).

Campaign money laundering is one of the most serious violations of the Act, as it denies the public of information about the true source of a candidate's financial support. Therefore, the typical administrative penalty in a campaign laundering case has historically been at or near the maximum penalty per violation, depending on the circumstances of the violation. In this matter, most of the reimbursed contributions were significant, and 18 of the 23 contributions were in the amount of \$3,000 or more. In addition, many of the contributions circumvented state contribution limits, and many of the reimbursements were made in cash. Furthermore, the amount of reimbursed contributions, totaling \$66,400, was relatively large, and there was a repeated pattern of violations over the course of five years. Due to these aggravating factors, a maximum fine for Counts 1 through 23 is warranted.

In mitigation, Respondents brought these violations to the attention of the Commission voluntarily, were very remorseful, and provided documents and records to assist in the Commission's investigation. Despite a pending criminal action in San Bernardino County, Respondent Leggio allowed himself and other employees of his businesses to be interviewed by Commission staff. Respondents have also hired attorneys and campaign professionals to correct reporting errors and to ensure that violations such as these do not occur in the future.

Based on the facts and circumstances of this case, an administrative penalty in the amount of One Hundred and Fifty Thousand Dollars (\$150,000) is justified.